

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company)	
)	
Application for Review of Alternative Regulation Plan)	Docket No. 98-0252
)	
Petition to Rebalance Illinois Bell Telephone)	
Company's Carrier Access and Network Access Line)	Docket No. 98-0335
Rates)	(Consol.)
)	
)	

REVISED FIFTH SET OF DATA REQUESTS OF AMERITECH ILLINOIS TO
GOVERNMENT AND CONSUMER INTERVENORS

Illinois Bell Telephone Company ("Ameritech Illinois") hereby submits its Revised Fifth Set of Data Requests to the Government and Consumer Intervenor ("GCI"). Responses should be delivered to Karl B. Anderson, Ameritech Illinois, 225 West Randolph Street, Suite 25D, Chicago, Illinois, 60606, on or before January 30, 2001.

DEFINITIONS AND INSTRUCTIONS

- 1.. "Relate to" or "refer to" shall mean, in addition to their customary and usual meaning, to reflect on, to pertain to, support, evidence, constitute, or mention.
2. "And" as well as "or " are to be construed either disjunctively or conjunctively so as to bring within the scope of this request any matters that might be construed outside its scope.
3. The terms "Document" or "Documents" are intended to be comprehensive, including without limitation any kind of written or graphic material, including workpapers,

whether typed, handwritten, printed, computer-generated, or matter of any kind from which information can be derived, however produced, reproduced or stored on paper, cards, machines, tapes, film, electronic facsimile, disks, computer tapes, printouts, computer programs or computer storage devices or any other medium, of any nature whatsoever, including all originals, copies and drafts.

4. If GCI asserts any privilege as to any Documents responsive to this request, it shall identify the author(s) of the Document, the addressee(s), the recipients(s) of copies, the date of the Document, the nature of the Document (e.g., letter, memorandum, handwritten notes), the length of the Document, the Document's current location, and the specific reason(s) why GCI contends that the Document is privileged or otherwise protected from discovery.

5. In the event that a Document responsive to a data request was provided to GCI by Ameritech Illinois, GCI need not produce the Document but should identify the Document with specificity.

DATA REQUESTS

1. State the basis for Mr. Dunkel's assertion that if "Ameritech Illinois were to contact with an unaffiliated publisher, Ameritech Illinois would be able to obtain a publishing fee (or retain a portion of the yellow page revenues as its publishing fee)," at page 27, lines 17-19 of GCI Exhibit 9.0. Provide all Documents relied on by Mr. Dunkel in support of that statement.
2. With respect to Mr. Dunkel's statement on page 27 of his rebuttal that independent publishers bid for an "independent LEC's" directory business, please identify each and every "independent LEC" known to Mr. Dunkel to which this statement refers and state the basis for Mr. Dunkel's knowledge.
3. With respect to Mr. Dunkel's statement on page 27 of his rebuttal that "independent publishers" bid for an independent LEC's directory business, please identify each and every "independent publisher" known to Mr. Dunkel to which this statement applies and state the basis for Mr. Dunkel's knowledge.
4. With respect to Mr. Dunkel's statement at page 27 of his rebuttal that independent publishers bid for an independent LEC's "directory business," please explain specifically and completely what is meant by the term "directory business" as that term is used by Mr. Dunkel.
5. With respect to each and every independent publisher identified in response to request number 2 above, please identify each and every independent LEC known to Mr. Dunkel to which the independent publisher has paid a "publishing fee" as that term is used by Mr. Dunkel on page 27 of his rebuttal testimony, state the amount or method of calculation of the publishing fee paid to each such LEC, state the time period during

which the payment was made, identify any and all services provided by the independent LEC in connection with the publishing fees paid, and attach copies of any and all contracts or other Documents in Mr. Dunkel's or GCI's possession or control which reflect or otherwise Document any such payments of publishing fees.

6. With respect to Mr. Dunkel's statement at page 27 of his rebuttal that independent publishers "bid" for an independent LEC's directory business, please identify each and every LEC known to Mr. Dunkel that has solicited or accepted bids from directory publishers for the LEC's directory business, state the basis for Mr. Dunkel's knowledge and attach copies of any and all Documents in Mr. Dunkel's or GCI's possession that document or describe any such bids.
7. With respect to Mr. Dunkel's claim at page 27 of his rebuttal that Ameritech Illinois failed to competitively bid its "directory business," please identify each and every directory publisher known to Mr. Dunkel that would be, or would have been, willing to pay Ameritech Illinois a publishing fee or allow Ameritech Illinois to keep a portion of directory advertising revenues in exchange for Ameritech Illinois' "publishing business" as that term is defined by Mr. Dunkel, state the basis for Mr. Dunkel's knowledge and provide copies of any and all Documents in Mr. Dunkel's or GCI's possession that support Mr. Dunkel's contention.
8. With respect to Mr. Dunkel's statement on page 29, lines 11-12, of GCI Ex. 9.0, which reads, "In addition, some independent publishers do print ILEC endorsed directories, under contract with ILECs who do not have affiliated publishers," please provide the following information:

- a. specifically identify each and every independent publisher to which this statement refers;
- b. specifically identify each ILEC to which this statement refers;
- c. please produce copies of any and all “contracts” between independent directory publishers and ILECs to which this statement refers that are in Mr. Dunkel’s or GCI’s possession;
- d. state the amounts or the method of calculation of any payments or other consideration paid by the independent directory publishers to the ILECs under the contracts to which this statement refers.